

## EXHIBIT B

**Video Deposition of Nancy L. Wilde - July 30, 2012**

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
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RUTHELLE FRANK, et al.,  
Plaintiffs,  
-VS- VIDEO DEPOSITION OF:  
NANCY L. WILDE  
CASE NO. 2:11-cv-01128  
SCOTT WALKER, et al.,  
Defendants.  
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Video deposition examination of  
NANCY L. WILDE, taken at the instance of the  
Plaintiffs, under and pursuant to Rule 30 of the  
Federal Rules of Civil Procedures and the acts  
amendatory thereof and supplementary thereto,  
pursuant to Notice upon the parties, before Monica M.  
Hunkins, RPR, a Notary Public in and for the State of  
Wisconsin, at the University of Wisconsin - Marathon  
County, 518 South 7th Avenue, Wausau, Wisconsin, on  
the 30th day of July, 2012, commencing at 2:05 p.m.  
and ending at 3:08 p.m.

<p style="text-align: right;">Page 6</p> <p>1 A. Yes. My maiden name was Nancy Lee Jojade.  2 Q. And how do you spell that?  3 A. J-O-J-A-D-E.  4 Q. And what is your date of birth?  5 A. July 20th, 1937.  6 Q. And where were you born?  7 A. In Wausau, Wisconsin.  8 Q. And have you lived in this area your whole  9 life?  10 A. Yes, I have.  11 Q. What is your current address?  12 A. 119 Airport Street, Schofield, Wisconsin.  13 Q. And how long have you lived there?  14 A. Since 1958. '57. I'm sorry. Did I say  15 '58? I'm sorry. '57.  16 Q. So you've lived there since 1957?  17 A. Yep.  18 Q. And does anyone live at your house with  19 you?  20 A. My husband, Gerald Wilde.  21 Q. And how long have you been married?  22 A. For -- it will be 55 years this year. As of  23 1957 we were married.  24 Q. Did you graduate from high school?  25 A. Yes. From Wausau Senior High School.</p>	<p style="text-align: right;">Page 8</p> <p>1 A. No.  2 Q. Do you have a U.S. passport?  3 A. No.  4 Q. Have you ever had one?  5 A. No.  6 Q. Do you have any other form of photo ID?  7 A. Not that I can think of.  8 Q. Okay. I want to now ask you about your  9 voting background.  10 A. Yes.  11 Q. When was the first time that you voted?  12 A. In 1957.  13 Q. And where do you typically vote?  14 A. I vote at the Schofield City Hall.  15 Q. How frequently do you vote?  16 A. I voted every year that I can think of  17 anyway except for two years when I was in the  18 hospital.  19 Q. Have you ever had your right to vote taken  20 away by a court?  21 A. No.  22 Q. Do you have any felony convictions?  23 A. No.  24 Q. Mrs. Wilde, why do you vote?  25 A. Because I think it's a very important thing.</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. And when did you graduate?  2 A. In 1955.  3 Q. Have you had any other formal education?  4 A. No.  5 Q. Are you currently employed?  6 A. No.  7 Q. Did you work previously?  8 A. Yes. Years ago I worked for an insurance  9 company. I was a secretary for an insurance  10 company.  11 Q. Did you do anything else in your life?  12 A. When my husband had a trucking business, I  13 would do financial records for him.  14 Q. And when did you retire?  15 A. I retired from my secretarial work in 1960  16 and five years ago from my husband's work.  17 Q. Mrs. Wilde, I'm going to ask you a few  18 questions about your attempts to get a photo ID in a  19 bit, but first, I want to ask you about your driving  20 and ID background. Do you currently have a driver's  21 license?  22 A. No, I do not.  23 Q. Have you ever had one?  24 A. No.  25 Q. Do you drive?</p>	<p style="text-align: right;">Page 9</p> <p>1 I --  2 Do you want me to go on?  3 It's -- it's very important. I do  4 believe that it will be better government. It will  5 be -- more people will benefit from it if everyone  6 would vote.  7 Q. Did you vote in the most recent election?  8 A. Yes, I did.  9 Q. Did you have to show a photo ID?  10 A. No. All I had to do was sign my name.  11 Q. Okay. Mrs. Wilde, I'd like to ask you some  12 questions about attempts you've made to get a photo  13 ID so that you can vote --  14 A. Yes.  15 Q. -- under the photo ID law.  16 A. Yes.  17 Q. Generally what attempts have you made to  18 secure a photo ID?  19 A. I've made three attempts to get -- the first  20 one was in 19 - excuse me - 2004.  21 Q. So you -- you made your first attempt about  22 eight or so years ago?  23 A. Eight years ago, yes, ma'am.  24 Q. And what did you do in 2004 to get your  25 ID?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Well, the reason I was -- I got involved in 2 the first place, my sister, who lives in Florida, 3 asked me to get her a copy of her birth certificate. 4 And so I went to the Register of Deeds. And as long 5 as I was there, being that -- for health purposes, I 6 decided to try to find mine too. I asked if I could 7 get mine too, but they told me they had no record of 8 my birth in Marathon County. 9 Q. In Marathon County? 10 A. Yes. 11 Q. Just to back up just a bit, what is your 12 sister's name? 13 A. Leatrice. 14 Q. And is she older than you? 15 A. Yes. She's ten years older than I am. 16 Q. Did they have her birth certificate? 17 A. Yes, they did. 18 Q. And did she receive a copy? 19 A. Yes, she did. They sent it to her. 20 Q. So what did you -- what steps did you take 21 after you found out that the Marathon County Register 22 did not have a copy of your birth certificate? 23 A. They gave -- at the Marathon County Register 24 of Deeds, gave me a number to call in Madison, which 25 I did, asking for forms to -- to fill out so that I</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. So they sent you an application for a 2 delayed birth certificate? 3 A. That's -- that's correct. 4 Q. And what did you do when you received it? 5 A. We -- I filled it out. I shouldn't say we. 6 But I filled it out. And then I sent it all back. 7 They had some other things. And they also wanted an 8 affidavit from my sister verifying that I was born on 9 the day I was. 10 Q. And so -- go ahead. 11 A. Excuse me. But she was the only one that I 12 had to provide an affidavit. All the rest of my 13 relation are already passed. 14 Q. So in 2004, you submitted the application? 15 A. Yes. 16 Q. And you submitted an affidavit from your 17 sister? 18 A. That's correct. 19 Q. Did you submit any other forms? 20 A. I submitted copies of forms to identify 21 myself - my social security form, my Medicare card, 22 other cards that I had, and credit cards and our tax 23 -- copy of our tax records with my husband and my 24 name both on and our copy of -- that we owned the 25 house and everything, anything I could find that</p>
<p style="text-align: right;">Page 11</p> <p>1 could receive a birth certificate. 2 Q. Do you know who you were calling in 3 Madison? 4 A. It was the Vital Records, Department of 5 Vital Records. 6 Q. And so what steps did you take after they 7 told you to call? 8 A. We called and asked for the -- for the 9 record. We explained the situation, asked for the 10 records, and then they sent me records to -- to be 11 filled out and sent back. 12 Q. When you say "we," who do you mean? 13 A. My husband was there to help me. He always 14 is. 15 Q. And what's his name? 16 A. Gerald. 17 Q. Gerald Wilde? 18 A. Yes. 19 Q. And so you called. And what records did 20 they -- or what documents did they send you to fill 21 out? 22 A. They sent me a certificate to fill out for 23 an application for -- here we go again. I'm sorry. 24 I need help. A delayed birth certificate. There we 25 go.</p>	<p style="text-align: right;">Page 13</p> <p>1 would verify who I was and where I was or how long I 2 lived there. 3 Q. Do you -- so, Mrs. Wilde, you were unable to 4 locate your birth certificate. Did you have any 5 other documents from your early years? 6 A. I had a -- I got records from my church 7 being of the baptism. I had a baptismal certificate. 8 I had a certificate from the hospital that I was 9 born. I -- I got -- let's see. 10 Q. Well, let's break that down. 11 A. Okay. 12 Q. So on your baptismal certificate, do you 13 know what information is included? 14 A. Is my name, the date of -- of the baptism, 15 my father's name, my mother's name. 16 Q. And what church were you baptized in? 17 A. Grace United Church of Christ in Wausau. 18 Q. And does that church still exist? 19 A. Yes, it does. 20 Q. And you also mentioned that you have a 21 hospital certificate? 22 A. Yes, I do. 23 Q. And what information to your knowledge does 24 that contain? 25 A. That also has my name and my mother's name,</p>

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<p>1 my father's name, the date, also my weight, my birth 2 weight. And I think that's -- there's maybe other 3 information, but that's -- that's about the most 4 important.</p> <p>5 Q. And you submitted those documents together 6 with your application?</p> <p>7 A. Yes, I did.</p> <p>8 Q. And what did you receive in response?</p> <p>9 A. I received -- everything came back that I 10 had filled out, and there was -- we had taken a long 11 time to get all the information. And it took a long 12 time to come back. But when it did, it -- there was 13 a letter with it saying that they could not grant me 14 any infor -- any birth certificate because I had 15 signed it wrong. I had signed it with my maiden 16 name. In parentheses in the middle I had written 17 "Nancy Lee Jojade Wilde," and they said that was 18 wrong. I was not supposed to include the Wilde, I 19 believe. Also, when my sister had -- had an 20 affidavit for this -- this, written it, she wrote it 21 the same way, and they -- they -- they would not 22 accept that either.</p> <p>23 Q. Did you pay a fee when you applied?</p> <p>24 A. I sent the \$20 in by check, but they also 25 sent the money back.</p>	<p>1 A. Yes, we were.</p> <p>2 Q. When did you go?</p> <p>3 A. That was about two years ago.</p> <p>4 Q. And what happened then?</p> <p>5 A. They still said that I would need the -- 6 that -- that they had told us before the birth 7 certificate or a driver's license, which I didn't 8 have neither -- neither one.</p> <p>9 Q. So because you didn't have a birth 10 certificate or driver's license, you were denied a 11 photo ID card a second time?</p> <p>12 A. Correct.</p> <p>13 Q. And that was about two years ago?</p> <p>14 A. Correct.</p> <p>15 Q. Did you make any other attempts to get your 16 birth -- get a birth certificate or a copy?</p> <p>17 A. I -- let's see. My husband called about a 18 year ago and called the Vital Records office thinking 19 maybe they've maybe found something now, but they, of 20 course, hadn't, and --</p> <p>21 Q. And --</p> <p>22 A. -- they sent us some more forms to fill 23 out.</p> <p>24 Q. And why did you call them? And when I say 25 "them," why did you call the Vital Records office?</p>
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<p>1 Q. And do you know roughly when you received 2 the negative response?</p> <p>3 A. May of 2004.</p> <p>4 Q. What did you do after receiving that?</p> <p>5 A. I became angry reading it. We had put so 6 much effort and work into getting all these things 7 filled out and copied. I also thought, I don't think 8 I really needed -- I wasn't planning on getting a 9 driver's license. I wasn't -- I really didn't need 10 it for -- I didn't think I needed it much. I -- I 11 was -- everything -- I had my social security. I had 12 my Medicare. Everything was being taken care of 13 health-wise. I thought maybe I really don't need 14 this. I thought, I'm just going to put it off. So I 15 kept the papers, but I did not do anything else, not 16 -- not right then anyway.</p> <p>17 Q. Around the same period, did you make any 18 other efforts to get a photo ID?</p> <p>19 A. Well, a few -- we went to the V -- what's 20 that -- V -- oh, I'm sorry. DV -- DMV office. And 21 told them about the situation. But they told us that 22 we needed that birth certificate, and that was all 23 there is to it. So we couldn't -- they told us they 24 -- they couldn't do anything about it.</p> <p>25 Q. Have you been back to the DMV since?</p>	<p>1 A. Because I had read that we might be needing 2 -- people might be needing a picture ID to vote. And 3 then -- then I thought, now I need it. Before I 4 didn't think I needed it, but now I need it. It was 5 very important to me. So that was the reason I 6 thought, well, we would go back and try again, do it 7 again.</p> <p>8 Q. So you said that the Vital Records office -- 9 was that in Madison?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. And did they -- what did they send you?</p> <p>12 A. They sent me some forms to fill out, about 13 the same ones I had filled out those years before.</p> <p>14 Q. So they sent you an application?</p> <p>15 A. Application for a delayed birth certificate, 16 yes.</p> <p>17 Q. What did you do in response?</p> <p>18 A. I sent -- I sent -- I -- I filled it out, 19 sent it back to Madison. And I haven't -- didn't 20 really hear anything after that from them.</p> <p>21 Q. Have you made a third attempt?</p> <p>22 A. Yes.</p> <p>23 Q. And what was that attempt?</p> <p>24 A. I called the -- that I need help with. What 25 is that?</p>